

Jennifer L. Braster
Nevada Bar No. 9982
Meredith L. Markwell
Nevada Bar No. 9203
Benjamin B. Gordon
Nevada Bar No. 15552
NAYLOR & BRASTER
1050 Indigo Drive, Suite 200
Las Vegas, NV 89145
Telephone: (702) 420-7000
Facsimile: (702) 420-7001
jbraster@nblawnv.com
Attorneys for Dr. Laila Mintas

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PlayUp, Inc., a Delaware corporation,

Plaintiff,

v.

Dr. Laila Mintas, an individual,

Defendant.

Case No. 2:21-cv-02129-GMN-NJK

**[UNOPPOSED] DR. LAILA MINTAS’
MOTION TO EXTEND TIME TO FILE
RESPONSE TO COUNTERMOTION FOR
SANCTIONS**

(First Request)

Dr. Laila Mintas, an individual,

Counterclaimant,

v.

PlayUp, Inc., a Delaware corporation; PlayUp
Ltd., an Australian company; Daniel Simic,
an individual,

Counterdefendants.

Pursuant to LR IA 6-1, Defendant/Counterclaimant Dr. Laila Mintas (“Dr. Mintas”), by and through her counsel of record, Naylor & Braster, hereby files this Motion to Extend Time to File Response to Countermotion for Sanctions (“Countermotion for Sanctions”). This is Dr. Mintas’ first requested extension. PlayUp Inc.’s Countermotion for Sanctions was filed on November 15, 2022. (ECF No. 257). Dr. Mintas respectfully requests a 3-day extension or until December 2, 2022, to file her response. This extension is sought in good faith and not to cause delay or prejudice to any party but rather due to the following factors as set forth in the accompanying declarations of Jennifer L. Braster, Benjamin Gordon, and Meredith Markwell:

1. Between November 21, 2022 and November 29, 2022, Dr. Mintas has four briefs due in this matter: Reply In Support of Motion to Disqualify (ECF No. 238) (currently due November 21, 2022), Reply In Support of Renewed Motion for Discovery Sanctions (currently due November 21, 2022) (ECF No. 239), Response to PlayUp Inc.’s Motion for Sanctions Pursuant to Rule 11 (currently due November 28, 2022) (ECF No. 246), and Response to PlayUp Inc.’s Countermotion for Sanctions (ECF No. 257) (currently due November 29, 2022).
2. Dr. Mintas requested an extension until December 2, 2022, to file her response to the Countermotion for Sanctions as well as various extensions for the other briefs as set forth in Exhibit 1 to Ms. Braster’s declaration.
3. PlayUp Inc.’s counsel agreed to this requested extension so long as PlayUp Inc. is provided the same extension for the reply. Dr. Mintas has no objection to that request. (Exhibit 1).
4. This request is sought for the following reasons:
 - a. Lead counsel, Jennifer Braster, was in an all-day mediation on November 15, 2022. (Braster Decl. at ¶ 4).
 - b. Lead counsel, Jennifer Braster, has a continued trial on November 21 and 22, 2022. (*Id.* at ¶ 5).

1 c. Lead counsel, Jennifer Braster, has family traveling to Nevada from
2 November 16 through November 21, 2022, for the Thanksgiving holiday.
3 (*Id.* at ¶ 6).

4 d. Co-counsel, Meredith Markwell, is traveling out of state from November 19
5 through 27, 2022, for the Thanksgiving holiday. (Markwell Decl. at ¶ 3).

6 e. Co-counsel, Benjamin Gordon, is traveling out of state from November 19
7 through 26, 2022, for the Thanksgiving holiday. (Gordon Decl. at ¶ 3).

8 5. As set forth above, Dr. Mintas respectfully requests an extension to file her response
9 until December 2, 2022, due to pre-arranged travel for the holiday, lead counsel's
10 mediation and 2-day trial during this time, three other briefs due in this matter, as
11 well as the extended length of PlayUp Inc.'s Countermotion for Sanctions (as the
12 response and Countermotion for Sanctions total 36 pages).

13 Dated: November 16, 2022

NAYLOR & BRASTER

14 By: /s/ Jennifer L. Braster

15 Jennifer L. Braster, NBN 9982
16 Meredith L. Markwell, NBN 9203
17 Benjamin B. Gordon, NBN 15552
18 1050 Indigo Drive, Suite 200
19 Las Vegas, NV 89145

Attorneys for Dr. Laila Mintas

20 **IT IS SO ORDERED.**

21 Dated: November 17, 2022

22 
23 United States Magistrate Judge
24
25
26
27
28